

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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JONTHON HARRIS,

Plaintiff,

-against-

**DEFENDANTS  
PROPOSED VOIRE  
DIRE**  
15 CV 6657 (CM)

CITY OF NEW YORK; Detective BRIAN TAYLOR, Shield No. 4438; Police Officer NEIL MAGLIANO, Shield No. 2766; Police Officer SEAN NOCE, Shield No. 31328; Detective JUSTIN PARRIS, Shield No. 22965; Sergeant WESLEY FRADERA, Shield No. 4246,

Defendants.

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Pursuant to the Court's Individual Practices, defendants respectfully submit the following list of proposed questions for prospective jurors.

Dated: August 30, 2017 New York, New York

ZACHARY W. CARTER  
Corporation Counsel of the  
City of New York

/S/

By: Paul Johnson, Esq.  
Assistant Corporation Counsel  
*Attorneys for Defendants*  
100 Church Street, Room 3-218  
New York, NY 10007  
(212) 356- 2656

1. Please tell us about your work experience, beginning with who you work for now and what your job is.
2. Please tell us where your immediate family members are employed.
3. How many years of education do you have?
4. Did you ever serve in the military?
  - a) If yes, what rank did you hold?
  - b) What were your duties?
5. Have you ever served on a jury before?
6. Have you, your family or any member of your household been a party to a lawsuit? If so please

explain.

7. Do you know anyone currently or previously employed by the law department?
8. Do you know anyone currently or previously employed by the City of New York?
9. Do you know anyone currently or previously employed by the New York City Police Department?
10. Do you know Gabriel Harvis or Paul Johnson?
11. Do you know the plaintiff or defendants in this matter?
12. Do you have any opinions concerning the NYPD?
13. Have you or any member of your immediate family employed?
14. Have you or has any member of your immediate family household ever held a job in (a) a law enforcement agency (b) any government agency (c) the state or local police (d) the FBI (e) any prosecutor's office (f) probation agency or (g) a private detective or security guard agency
15. Have any of your neighbors, friends or relatives ever held a job in a enforcement (b) a governmental agency (c) the state or local police (d) the FBI (e) any prosecutor's office (f) probation and parole agency or (g) a private detective or security guard agency?
16. Does your job cause you to work with any law enforcement agency?
17. Have you or any member of your family member been a member of a criminal street gang?
18. Have you or any member of your family been stopped by the police?
19. Have you or any member of your family have been convicted of a crime?
20. Have you or any member of your family been arrested?
21. Have you or any member of your family given testimony in any court proceeding?